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June 9, 2004

The Honorable Bruce Duke
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for July 2004 and preliminary August 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with July data, and previews the changes BellSouth is considering making for August data. A Data Disclosure Report for June 2004 would be filed at this time as well, if needed; however, for June 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

Sincerely,



Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record

PC Docs # 540261

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COMMUNICATIONS

PROPOSED JULY 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the July 2004 data month. Results for the July 2004 data month will be posted as follows:

Preliminary results August 20, 2004
Final results August 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 16.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data continues to be correctly captured and reported. This proposed change was Item (1) on the Preliminary July Data Notification filed on May 3, 2004.

Impact of Change: None.

- (2) *Affected Measures:* O-8 & O-9

Description of Change: Currently, PMAP code is not excluding non-business hours from the FOC Timeliness and Reject Interval calculations for Local Interconnection Trunks as required by the SQM. BellSouth proposes to correct the code to exclude non-business hours consistent with the SQM. This proposed change was Item (2) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5160)

Impact of Change: For January 2004, in Tennessee, the result for FOC Timeliness would improve from 88.89% to 100% and Reject Interval would improve from 66.67% to 91.67% for Local Interconnection Trunks.

(3) *Affected Measures:* O-8, O-9 & O-11

Description of Change: Currently, PMAP is not capturing the appropriate FOC/Clarification response time for ELMS6 LNP LSRs. BellSouth proposes to correct this issue by obtaining the appropriate timestamp from another field in the LNP data feed. This proposed change was Item (3) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5188)

Impact of Change: For March 2004, for the Region, 83 of 3405 LNP records reported incorrect times for FOC Timeliness, 14 of 784 LNP records reported incorrect Clarification times and 97 of 4180 LNP records reported incorrect times for FOC and Reject Completeness.

(4) *Affected Measures:* O-7 & O-8

Description of Change: Currently, BellSouth is incorrectly reporting Partially Mechanized LSRs originated via ELMS6 as Fully Mechanized when the service representative works the LSR but does not identify it correctly. BellSouth proposes to change the PMAP code to correct this problem. This proposed change was Item (4) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5197)

Impact of Change: For February 2004, 91 Fully Mechanized LSRs for the region should have been reported as Partially Mechanized LSRs. Of these 91 LSRs, 6 were reported as misses for Fully Mechanized with no change to the total result.

(5) *Affected Measures:* O-3 & O-4

Description of Change: Currently, certain LEO LSRs originated via ELMS6 are being erroneously counted as “planned manual” fallout on the Flow-Through report because of a difference in the text of an audit message between TCIF9 and ELMS6. BellSouth proposes to correct the Flow-Through code to look for the new text. This proposed change was Item (5) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5198)

Impact of Change: For February 2004, 80 LSRs were incorrectly counted as “planned manual” fallout. For that period, aggregate and UNE Flow-Through would have improved by .01%.

Provisioning Measurements

- (6) *Affected Measures:* P-1

Description of Change: Currently, Local Interconnection Trunk data is missing from the Held Order Interval Report. BellSouth proposes to include Local Interconnection Trunk data in this report as required by the SQM, to the extent such data exists. This proposed change was Item (6) on the Preliminary July Data Notification filed on May 3, 2004. (RQ4816)

Impact of Change: For January 2004, Florida Held Order Interval for CLEC Local Interconnection Trunks would have been 10 days with two orders being held during that month. The BST Analog would be 21 days with nine total orders being held during that month.

- (7) *Affected Measures:* P-11 (Louisiana only)

Description of Change: Currently, the PMAP code is incorrectly populating CLEC volume in the interval distribution on the CLEC Specific MSA reports for LNP products. Instead of reflecting the total CLEC volume for the product as the denominator, the denominator for each interval distribution is the same as the numerator. BellSouth proposes to correct this problem. This proposed change was Item (7) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5032)

Impact of Change: None

- (8) *Affected Measures:* P-11

Description of Change: In anticipation of Encore Release 16.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data continues to be correctly captured and reported. This proposed change was Item (8) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5210)

Impact of Change: None

- (9) *Affected Measures:* P-1, P-2A, P-2B, P-3, P-4A, P-4B, P-5, P-6 & P-9

Description of Change: Currently, BellSouth is not capturing all retail ADSL classes of service for these measurements. BellSouth proposes adding additional information to the product classification rules to identify and report all orders with retail ADSL activity. This proposed change was Item (9) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5216)

Impact of Change: For February 2004, in Florida, the Held Order Interval volume for ADSL, Dispatched, <10 Circuits, and Held for Facilities, would have increased by 15, or 5.8%. For Business, the Held Order Interval volume within the same categories would have decreased by 15, or 7.7%.

(10) *Affected Measures:* P-13B

Description of Change: With the implementation of Encore Release 16.0, BellSouth will have the ability to mechanize the process for identifying LNP orders that are eligible for application of a Trigger. BellSouth proposes to mechanize the process for determining Trigger eligibility within PMAP. (RQ5338)

Impact of Change: None

Billing Measurements

(11) *Affected Measures:* B-10 (Florida, Georgia, North Carolina, and Tennessee)

Description of Change: Currently, invalid records, such as duplicate entries in the Billing Dispute Activity Tracking System (BDATS) dispute file, are being counted in the results. BellSouth proposes to correct this error. This proposed change was Item (10) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5184)

Impact of Change: For March 2004, in Florida, 0.4% of the total records reported were invalid.

Database Measurements

(12) *Affected Measures:* D-2

Description of Change: Currently, BellSouth is providing a regional report for this measure even though it is not required. BellSouth proposes discontinuing the production of a regional report for this measure consistent with the SQM. This proposed change was Item (11) on the Preliminary July Data Notification filed on May 3, 2004. (RQ5068)

Impact of Change: The report will no longer be produced.

PRELIMINARY AUGUST 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the August 2004 data month. Results for the August 2004 data month will be posted as follows:

Preliminary results September 20, 2004
Final results September 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-11

Description of Change: Currently, for LSRs processed by COG, PMAP is counting fatal reject notices as LSRs with no response. BellSouth only has a record of the fatal reject notice, not the LSR that generated it. Since these notices are not LSRs, they should not be reflected in this measure consistent with the SQM. BellSouth proposes to discontinue counting fatal reject notices in the denominator of this measure. (RQ5226)

Impact of Change: Regionwide, for March 2004, 22 fatal reject notices were incorrectly counted in the denominator of this measure.

(2) *Affected Measures:* O-11

Description of Change: Currently, BellSouth is reporting Non-Mechanized LSRs received at the end of the previous month and responded to in the current month in both data months. The response was correctly reported with the prior month's data but it is also incorrectly reported as an LSR with no response in the current data month. BellSouth proposes to correct this problem. (RQ5292)

Impact of Change: For March 2004, in Georgia, the result for Non-Mechanized LSRs for UNE LNP (Standalone) would increase from 96.68% to 97.85% (1.17%).

- (3) *Affected Measures:* O-12 (North Carolina only)

Description of Change: Currently, the column labeled CLEC Calls Abandoned on the statewide aggregate report incorrectly reflects the number of retail calls abandoned. BellSouth proposes to correct this problem. (RQ5295)

Impact of Change: None.

Provisioning Measurements

- (4) *Affected Measures:* P-7 & P-7A

Description of Change: Currently, BellSouth is not excluding orders that have CLEC caused delays from these measures as required by the SQM. However, BellSouth is excluding orders that have been identified internally as being in jeopardy of missed due dates, regardless of whether the date was actually missed. BellSouth proposes to correct these problems. (RQ5104)

Impact of Change: For January 2004, in Georgia, there would be no change to the P-7 measure. For P-7A, there would be an addition of 19 orders. However, the metric would remain 100% after the implementation of this change.

- (5) *Affected Measures:* P-1

Description of Change: Currently, all statewide aggregate and 12-month Held Order Interval reports incorrectly disaggregate held orders by appointment reason, either as Equipment, Facilities or Other. This disaggregation is only required on the CLEC Specific reports. Consistent with the SQM, BellSouth proposes to remove the appointment reasons from the Aggregate and 12 month reports. (RQ5208)

Impact of Change: The Aggregate and 12 month reports will no longer be disaggregated by appointment reason.

STATE OF SOUTH CAROLINA

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CERTIFICATE OF SERVICE

COUNTY OF RICHLAND

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The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed July 2004 Data Notification Report and Preliminary August 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this June 9, 2004:

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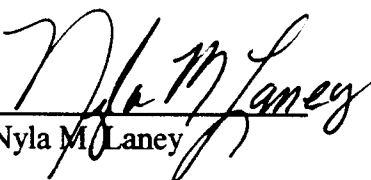
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